



Engineering & Environmental
Consultants, Inc.

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AIR PERMITS SECTION
SPD-R

March 12, 2013

Air Permits Initial Review Team (APIRT)
Texas Commission on Environmental Quality
Mail Code 161
12100 Park 35 Circle
Building C, Third Floor
Austin, Texas 78753

Re: Federal Operating Permit – Site Operating Permit (SOP) Renewal Application
Permit Number: O1532
Rescar, Inc. – Orange Texas Facility
Account No. OC0054A
Customer Reference Number: CN600540751
Regulated Entity Number: RN100234681

Air Permits Initial Review Team:

CSC Engineering & Environmental Consultants, Inc. (CSC) on behalf of Rescar, Inc. – Orange Texas Facility (Rescar) has prepared the attached renewal application for the existing Federal Operating Permit – Site Operating Permit (SOP) - Permit No: O1532. The renewal application is submitted in compliance with the federal operating permit program under Title 30 Texas Administrative Code (TAC) § 122. All required documentation for the renewal application was developed based on information provided by Rescar and is included in Attachment A. The latest facility drawing, identifying the location of each emission point (EPN) associated with the facility, is included in Attachment B.

- There have been no changes to the operations or the emission units since the previous renewal application submitted to the Texas Commission on Environmental Quality (TCEQ) in January 2009
- Rescar requests the correction of Special Condition No. 4 in the current SOP. It is our opinion that Special Condition No. 4 does not apply to the facility and should be removed from the Special Terms and Conditions language for the SOP renewal. During the 2009 renewal application, the facility was inadvertently listed as a motor vehicle fuel dispensing facility in the questions listed under Section III of the OP-REQ1: Application Area-Wide Applicability Determinations and General Information form. The Rescar Orange Texas facility is a railcar service facility and does not operate as a motor vehicle fuel dispensing facility.

As part of this renewal, the attached OP-REQ1 form has been completed to reflect current operation at the facility and the discrepancy associated with Special Condition No. 4 has been included as an Administrative Revision (code ADMIN-A) in Table 2 of the attached OP-2: Application for Permit Renewal form.

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Federal Operating Permit – Site Operating Permit (SOP) Renewal Application
Permit Number: O1532
Rescar, Inc. – Orange Texas Facility
March 12, 2013
Page 2,

Please feel free to contact either of the undersigned individuals at (979) 778-2810, or the Rescar, Inc. Vice President, Mr. Kevin Wilck at (281) 452-5481 ext. 113, if you have any questions regarding this issue.

Sincerely,



Philip W. Cadarette, P.E.
Senior Scientist



Scott A. Schautschick.
Senior Environmental Scientist

SAS:pwc
Enclosures – Title V Renewal Forms
Via - Fed Ex

cc: Mr. Kevin Wick – Rescar, Inc.
Regional Air Quality Manager - TCEQ Region 10 Beaumont
EPA – Region 6 (electronic copy)

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